Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
Revision of Part 22 and Part 90 of the Commission's Rules to Facilitate Future Development of Paging Systems	)	WT Docket No. 96-18
Implementation of Section 309(j) of the Communications Act - Competitive Bidding	)	PP Docket No. 93-253

COMMENTS OF LLOYD D. HUFFMAN - HUFFMAN COMMUNICATIONS

Huffman Communications is a licensed radio common carrier in Corsicana, Texas located 50 miles south of Dallas. It is the owner of a wide area 931 Mhz paging system which is centered at Corsicana but extends north into Dallas-Ft Worth and south into rural central Texas. It hereby respectfully submits the following comments regarding Dockets 96-18/93-253.

{23}. We agree with the conclusion that converting to geographic licensing in the 931Mhz band would be an efficient and flexible approach as long as the size of the geographic area is reasonable (see {33} following). This is because, to our knowledge, all of the existing systems in our area which are actually built out and operating are regional or multi-regional in nature and owned by a single owner. This situation followed naturally from the conception and evolution of 931 Mhz paging due to the exclusivity and protection granted to a licensee and the fact that the FCC assigned the frequency. This also made it possible for small businesses, such as ours, to participate

in the paging industry by allowing us the time to build out our systems while having limited protection from spectrum speculators.

{28} We do not feel that the lower bands are applicable to geographic licensing. Our UHF licenses are local in nature. They are on different frequencies for the three counties where they are located. They were originally used as mobile telephone channels before the advent of Cellular service. We have converted them to local area tone and voice service. There are other systems on these channels in all directions. It seems it would be very difficult considering all the existing systems, the various owners, and the various uses to which those owners are utilizing their channels to ever make one of these channels valuable from an area-wide auction standpoint.

{33} We strongly urge the Commission to utilize Economic Areas (EAs) to define the geographic license boundary. Exhibits 1 through 7 are coverage maps we have prepared for several large 931 mhz systems in the Dallas Ft Worth area. The coverage of each system is based on sales brochures, is approximate, and may not include new transmitter sites. On each map we have sketched the approximate boundary of EA #127. As can be seen, these systems have coverage that corresponds more closely to the EA than to the Dallas MTA, Exhibit 8. This build out was likely driven by pure market forces due to the lack of governmental coverage requirements and hindrance by other licensees on the same frequency or spectrum speculators as outlined above. The greatest system build out on a 931 mhz channel has been by the larger carriers which have

built or are building the DFW - San Antonio - Houston triangle. This area includes over 60% of the Texas population and definitely does not follow the MTA which extends east into Northern Louisiana and west into the Texas panhandle and eastern New Mexico. There is very little commonality between the DFW market and the Texas panhandle which is 500 miles away.

We are in the position of incumbent and naturally want to protect the value of our system which we have built since the 931 mhz lottery years ago. Based on the 1990 census data we have calculated we cover a substantial portion of the population of EA #127. Similarly, others who have built systems the size of ours and larger should benefit for their work and investment under the EA approach.

Those systems which cover the triangle area mentioned above cross several EAs, but again, the coverage follows the population and those operators should be in a good position for those EAs in population percentage.

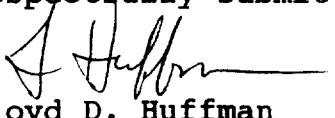
In our view the primary disadvantage to MTA geographic licensing is its impact on the existing small carriers and individuals in the future who would to like to start paging businesses. We feel that the large size and expense of bidding for the license and then constructing the system will effectively eliminate small business from the field if the area, as in our case, extends over 150000 square miles.

There are 172 EAs in the United States. This is much less than the 306 MSA/428 RSA cellular areas or the 487 Rand McNally BTAs.

There are only 47 MTAs. We feel the 172 EAs are a reasonable compromise between the interests of the various parties. The larger carriers have the resources to buy the EAs which they require to construct or build out a system. The finer resolution means that a carrier can shape a system more according to their perceived market trends or other factors. This will lead to more efficient operations and lower costs to the public. Small carriers, such as those with a gross of about $1 million or less and with the proposed bidding credits, still have a chance to participate in the paging business.

{37} We would urge the commission to allow incumbents to expand existing systems by building new transmitter sites as long as the location of the new site was within the combined interference contours of their existing systems and was done within a time window defined by the Commission. This would allow us to substantially complete planned coverage increases and limit our area expansion to about 90 miles in any one direction. While it would increase the size of the combined service and interference contours these additions are likely of value only to the incumbent. We feel this is a fair, one time opportunity for those of us who have operated under the old rules as we transition to the new rules and would help protect the value of our investment in the event we cannot afford a geographic licence.

Respectfully submitted,



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Metro Houston 931.4875Mhz System

Composite of three regional systems

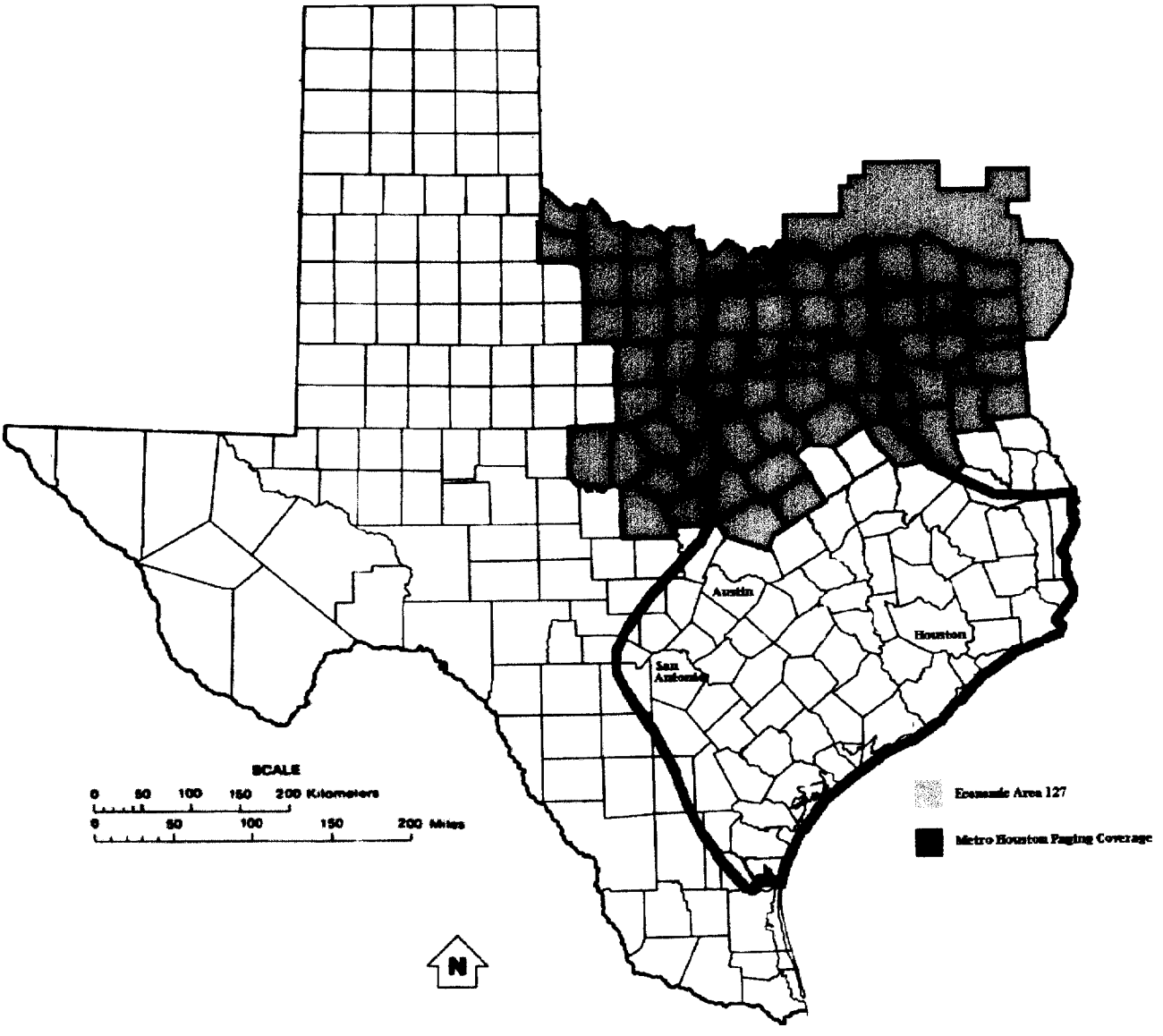

Exhibit 1

MetroCall Paging 929.1125Mhz System

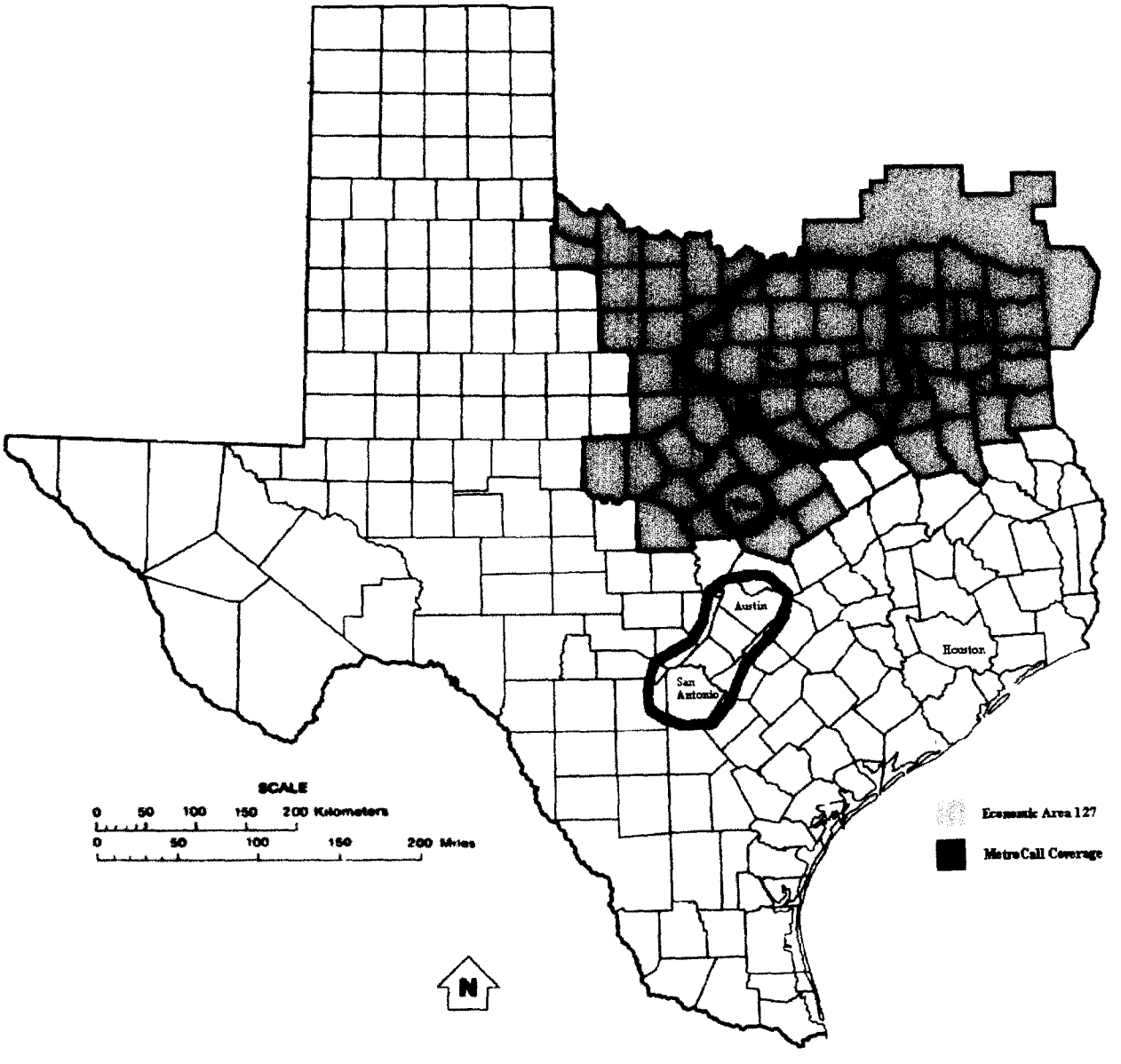

Exhibit 2

MetroCall 931.7875 Mhz System

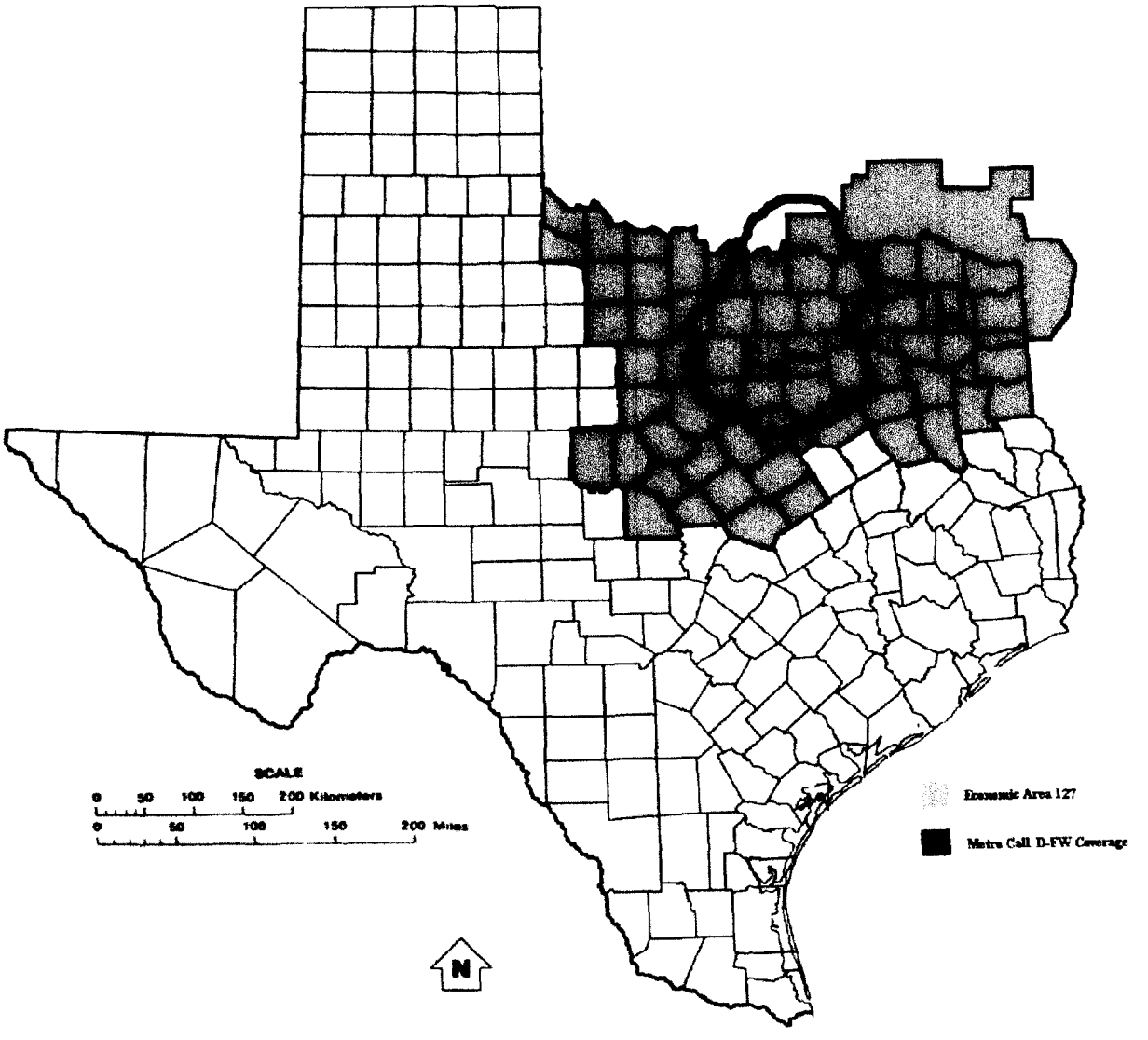

Exhibit 3

MobileMedia 931.8625Mhz System

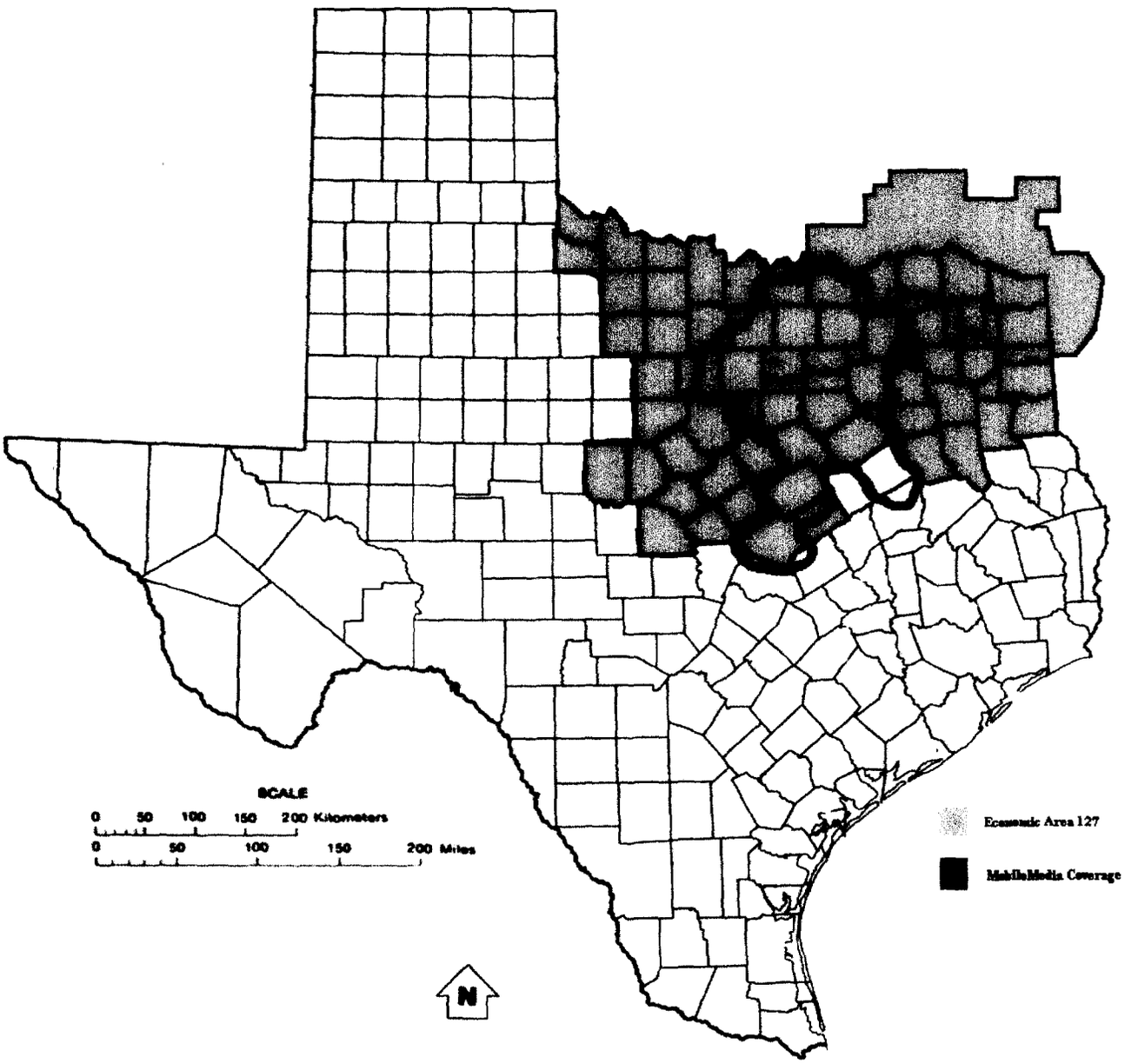

Exhibit 4

AirTouch 931.0625Mhz System

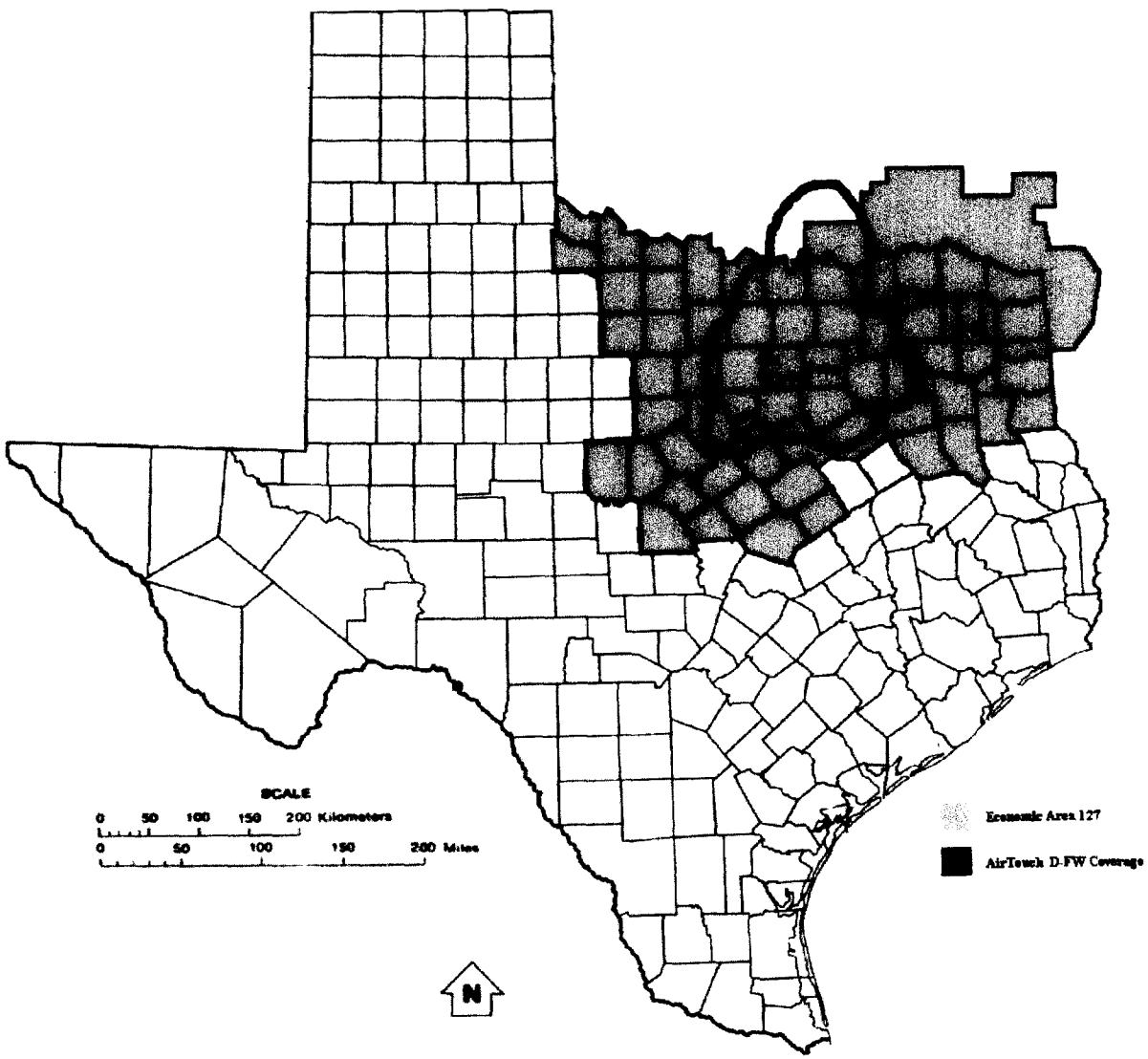

Exhibit 5

AT&T Wireless 931.5125Mhz System

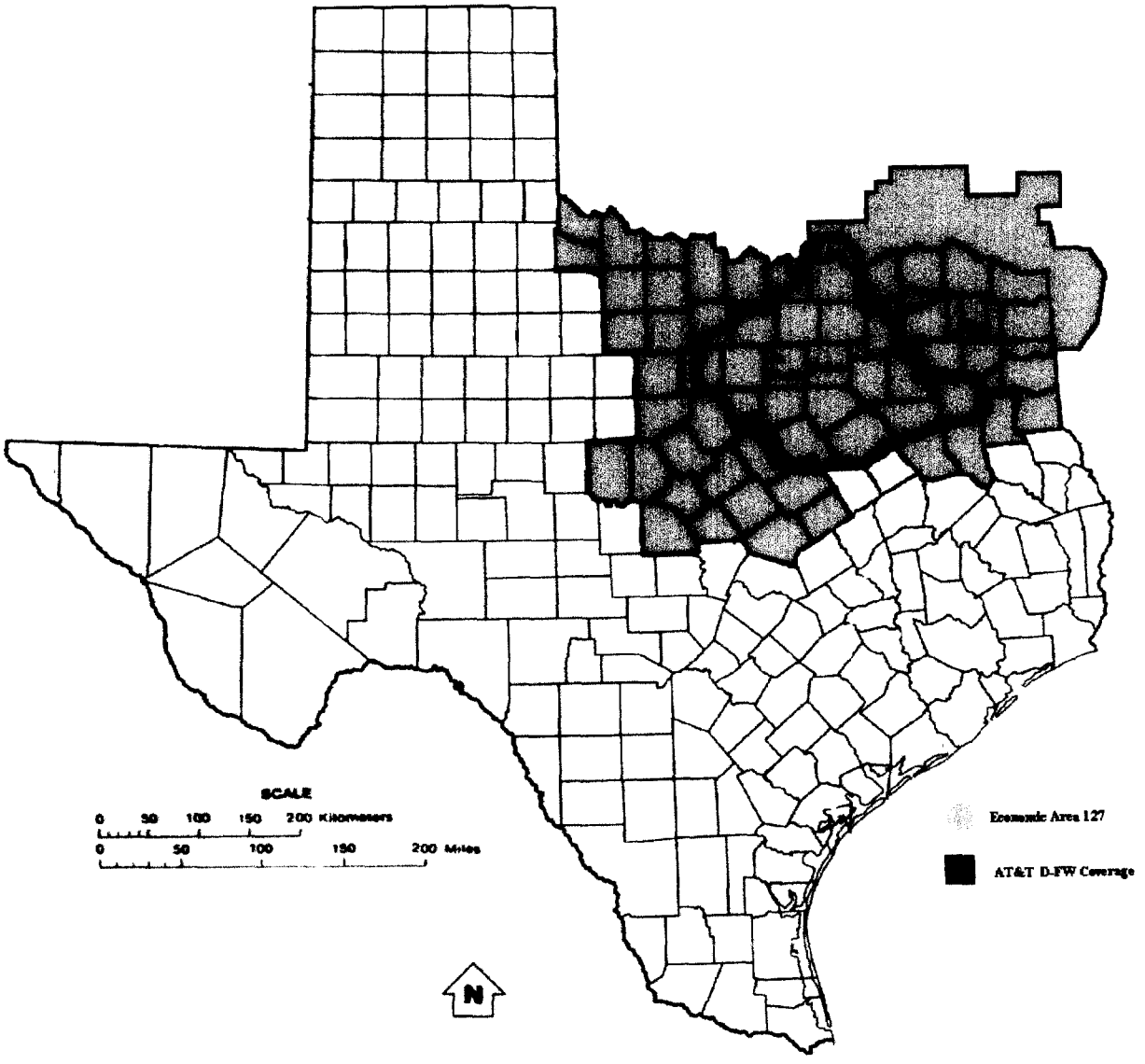

Exhibit 6

Huffman Communications 931.7625Mhz Coverage

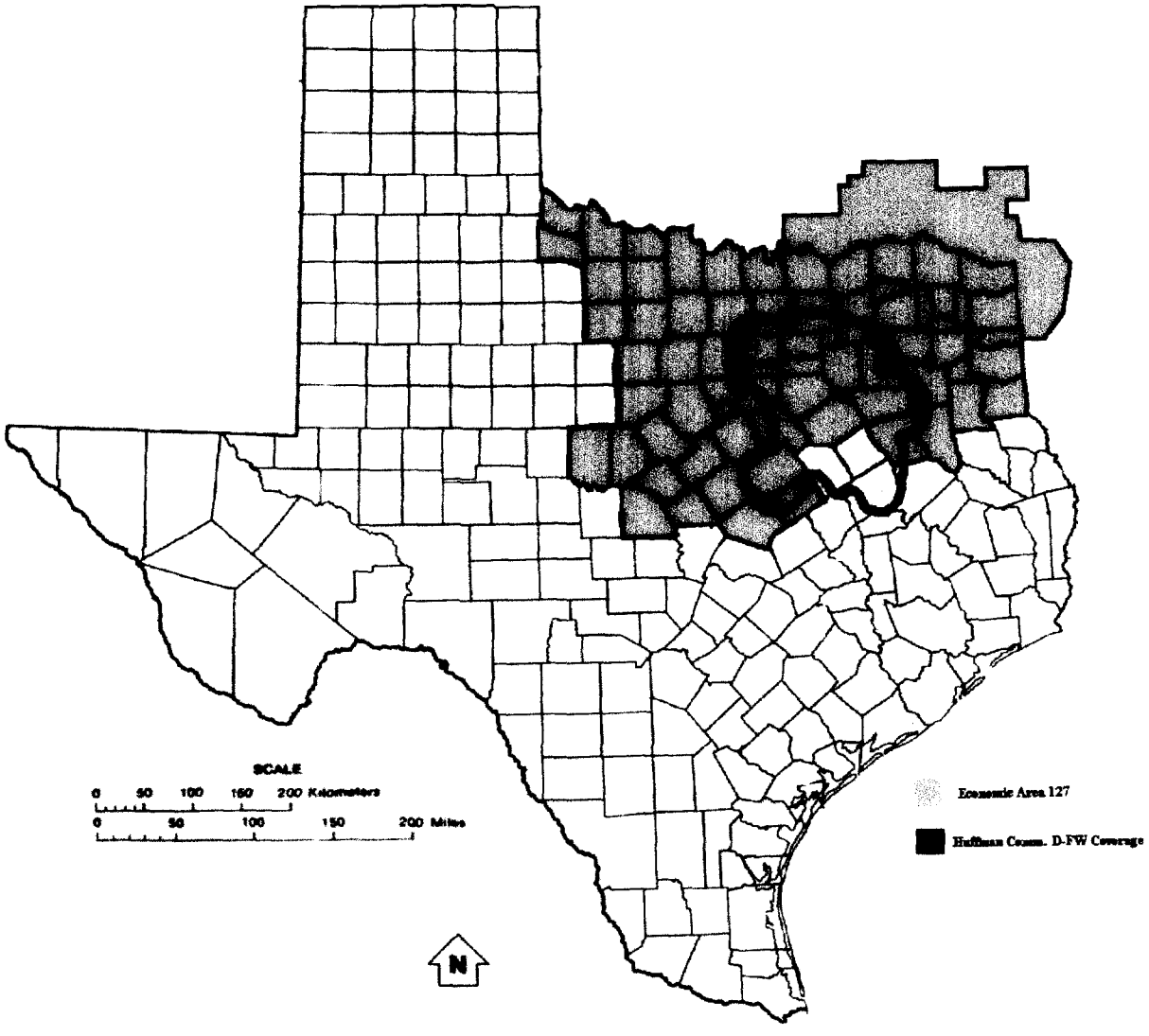

Exhibit 7

Dallas-Ft. Worth MTA

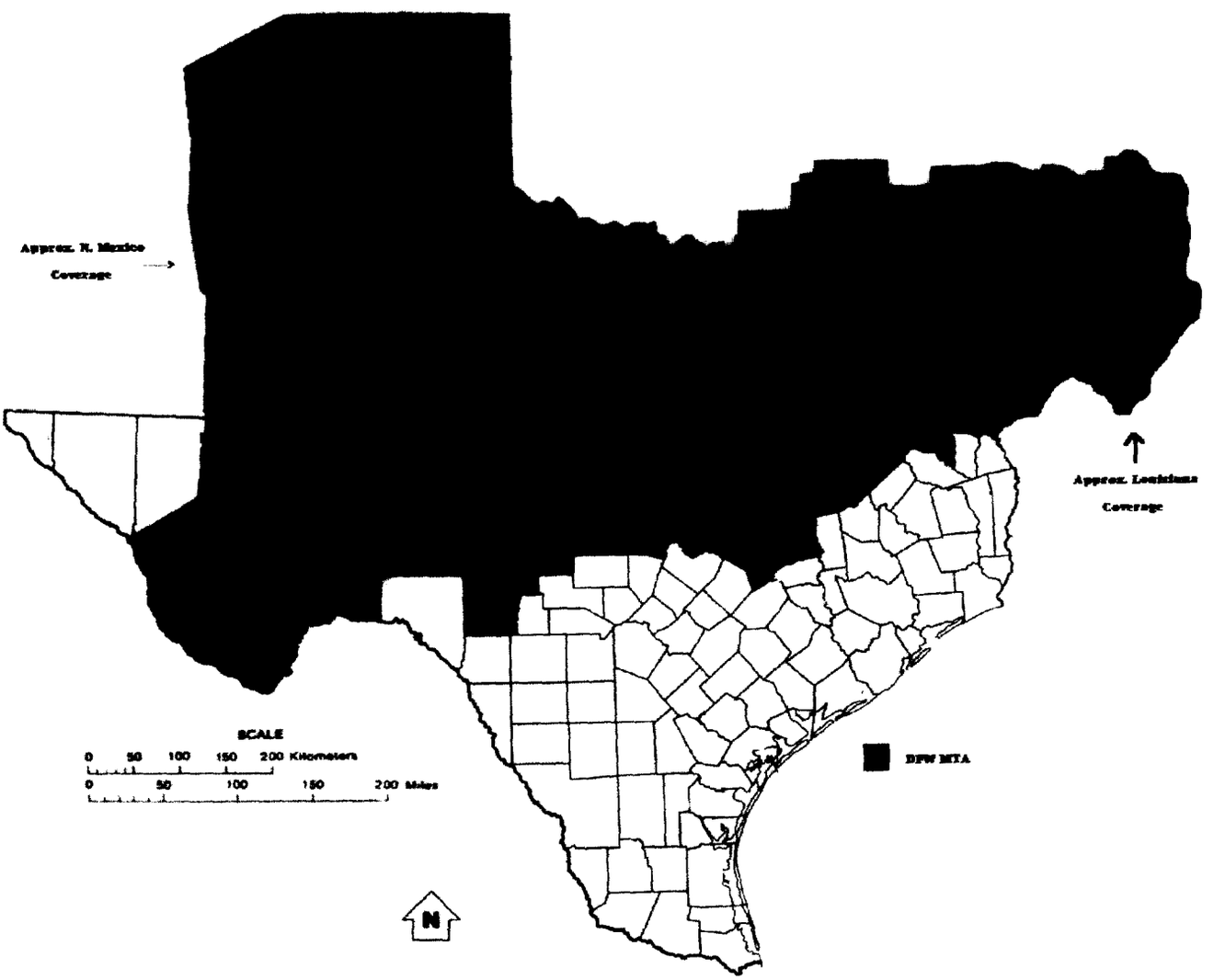

Exhibit 8